

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Application of ORLY
GENGER to Remove Dalia Genger as Trustee of
the Orly Genger 1993 Trust Established on
Dec.13, 1993 by Arie Genger, grantor.

SDNY Case No. 19-cv-9319 (AKH)

Orly Genger, beneficiary of The Orly Genger
1993 Trust,

Petitioner,

- against -

Dalia Genger, as trustee of The Orly Genger
1993 Trust, and The Sagi Genger 1993 Trust,

Respondents.

N.Y. Cty. Surrogate's Court File
No.: 2008-0017

STATEMENT UPON REMOVAL

Pursuant to Rule 9027(e)(3), The Orly Genger 1993 Trust does not consent to
entry of final orders or judgment by a United States Bankruptcy Judge.

The Orly Genger 1993 Trust will file a motion to remand this matter to
Surrogate's Court and will oppose the motion to transfer to the Western District of Texas (dkt.
#3).

Dated: October 22, 2019
New York, NY

Respectfully submitted,

POLLOCK COHEN LLP

By: /s/ Adam Pollock
Adam Pollock
60 Broad St., 24th Fl.
New York, NY 10004
(212) 337-5361
Adam@PollockCohen.com
*Attorneys for The Orly Genger 1993 Trust,
through Michael Oldner, Trustee*

To (via USPS First Class Mail):

Andrew R. Kurland, Esq.
Michael Paul Bowen, Esq.
Kasowitz Benson Torres LLP
1633 Broadway
New York, NY 10019
Counsel to the Bankruptcy Trustee

John Dellaportas, Esq.
Emmet Marvin & Martin LLP
120 Broadway, 32nd Floor
New York, NY 10271
Counsel to Sagi Genger 1993 Trust & Sagi Genger

Steven Riker, Esq.
Law Office of Steven Riker
One Grand Central Place, 46th Floor
New York, NY 10165
Guardian Ad Litem

Judith Bachman, Esq.
The Bachman Law Firm PLLC
365 S. Main Street, 2nd Floor
New City, NY 10956
Attorneys for Dalia Genger